

DENNIS R. CASHMAN (SBN 133390)
DARA L. CASHMAN (SBN 115018)
LAW OFFICES OF DENNIS CASHMAN
3223 Webster St.
San Francisco, CA 94123
Telephone: (415) 328-4715

Attorneys for Defendant Shiu Lung Leung
aka Chao-Lung Liang and Steven Leung

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHIU LUNG LEUNG, aka CHAO-LUNG
LIANG and STEVEN LEUNG ,

Defendant.

Case No. 09-CR-0110 SI

**DEFENDANT SHIU LUNG LEUNG'S
UNOPPOSED APPLICATION AND
(PROPOSED) ORDER FOR TEMPORARY
INTERNATIONAL TRAVEL OUTSIDE
THE NORTHERN DISTRICT OF
CALIFORNIA**

Defendant Shiu Lung Leung hereby requests that this Court permit him to travel outside the Northern District of California, to Taoyuan County, Taiwan, to bid his mother-in-law farewell and to then mourn her passing according to traditional Taiwanese custom. This request is based on the following:

1. On April 12, 2014 Mr. Leung was informed his mother-in-law, Mrs. Ho Tao-Mei Hsu, had fallen into a coma and was on life support. His mother-in-law is 88 years old. There is no expectation she will recover from this condition. The immediate family members have made the decision to remove Mrs. Hsu from life support to prevent further suffering. The family wishes to do this quickly, and are only delaying until Mr. Leung can arrive to say his goodbyes.

2. Mr. Leung is uncertain of exactly how long his proposed trip will take. He currently has a return reservation to the Northern District of California for April 26th, 2014. However, depending on funeral arrangements and traditional customs, this might be extended for up to one month, no later than May 15th 2014.
3. Mr. Leung has a tentative departing flight scheduled for April 16th 2014, leaving from San Francisco International Airport at 1:40 am, arriving at the Taipei International Airport, on April 17th, 2014 at 6:00 am (Taiwanese time). Mr. Leung will stay at his home address, #22, Lane 3, Bai-Nian 2 Street, Longtan Township, Taoyuan County, 325 Taiwan.
4. Mr. Leung will continue to observe all other terms of his release while in Taiwan. Through counsel, he will provide the government and his Pretrial Services Officer with his detailed itinerary.
5. In order to facilitate his travel by air consistent with TSA regulations, Mr. Leung requests this Court direct Pretrial Services to temporarily return his passport to him. He will use the passport to travel to Taiwan and return to the Northern District of California only. Mr. Leung will return his passport to the custody of Pretrial Services immediately upon his return, no later than May 15th 2014, (subject only to Pretrial Services business hours).
6. Counsel has provided government counsel and Pretrial Services Officer Allen Lew with supporting documentation as to these events. Counsel has communicated with government attorney Mr. Peter Huston, and Pretrial Services Officer Alan Lew. Due to the circumstances, neither party have any objection to this travel.

Accordingly, Mr. Leung respectfully requests that the terms of his release be temporarily modified to permit the requested travel.

Dated: April 14, 2014

s/ Dennis Cashman
Attorney for Shiu Lung Leung

ORDER

Based on the foregoing, and good cause appearing, IT IS HEREBY ORDERED that Defendant Shiu Lung Leung's conditions of release are hereby modified temporarily to permit him to travel outside of the Northern District of California consistent with the terms and conditions set forth above. Pretrial Services is directed to return Mr. Leung's passport to him or his counsel to permit Mr. Leung to travel as set forth above. Mr. Leung shall immediately return his passport to Pretrial Services when the above-described travel is complete (subject only to Pretrial Services' business hours).

IT IS SO ORDERED.

Dated: April ¹⁴____, 2014



The Honorable Susan Illston
United States District Judge